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UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
EASTERN DIVISION

UPNEET DHALIWAL AND JULIE  
GEARY

Plaintiffs,

vs.

JOSEPH KOMROSKY, in his  
official capacity as President of  
TEMECULA VALLEY UNIFIED  
SCHOOL DISTRICT BOARD OF  
TRUSTEES, and in his individual  
capacity, TEMECULA VALLEY  
UNIFIED SCHOOL DISTRICT  
BOARD OF TRUSTEES, and  
TEMECULA VALLEY UNIFIED  
SCHOOL DISTRICT

Defendants.

CASE NO. 5:23-CV-2605

**PLAINTIFFS' NOTICE OF  
MOTION AND MOTION FOR  
PRELIMINARY INJUNCTION**

Honorable Jesus G. Bernal  
Hearing Date: February 12, 2024  
Hearing Time: 9:00 a.m.

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2 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD: PLEASE  
3 TAKE NOTICE that on February 12, 2024 at 9:00 a.m., or as soon thereafter as  
4 counsel may be heard before the Honorable Jesus G. Bernal in Courtroom 1 of the  
5 United States District Court, Central District of California, Riverside, Plaintiffs  
6 Upneet Dhaliwal and Julie Geary (“Plaintiffs”) will, and hereby do, move this Court  
7 to grant a preliminary injunction to enjoin Defendant Joseph Komrosky from  
8 ordering the removal of members of the public from a Temecula Valley Unified  
9 School District Board meeting unless they are engaged in conduct that actually  
10 disrupts the meeting, and further enjoining Defendant Komrosky from enforcing,  
11 posting, or referring the public to disruptive conduct regulations that allow for  
12 expulsion for anything other than conduct that actually disrupts the meeting.

13 The Motion is based on this Notice of Motion, the accompanying Memorandum  
14 of Points and Authorities, the supporting declarations, all pleadings and papers filed  
15 in this action, and such additional papers and arguments as may be presented at or in  
16 connection with the hearing.

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18 Dated: January 12, 2023

Respectfully submitted,

19 ACLU FOUNDATION OF SOUTHERN  
20 CALIFORNIA

21 By: /s/ Jonathan Markovitz  
22 JONATHAN MARKOVITZ  
23 Attorneys for Plaintiffs  
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